

MEMO ENDORSED

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February 26, 2008

Via Fax - (212) 805-7949

Hon. P. Kevin Castel
United States District Judge
United States Courthouse
500 Pearl St., Room 2260
New York, NY 10007

USDS SDNY
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Re: Transglobe Shipping Co. Ltd. v. Sudama Export Pvt. Ltd.
Docket No. 07 Civ. 9877 (PKC)
United States District Court, Southern District of New York

Dear Hon. Judge Castel:

We represent the Plaintiff, Transglobe Shipping Co. Ltd., in the above referenced lawsuit. We write to the Court in connection with Plaintiff's application to amend its Verified Complaint and the Ex Parte Order of Maritime Attachment to include two additional defendants, A.B. Minerals Pvt. Ltd. and Devi Trading Co. Ltd. Plaintiff's amended complaint and ex parte order were hand delivered to your Honor's chambers this afternoon.

On November 7, 2007 your Honor issued an Ex Parte Order for the issuance of a process of maritime attachment and garnishment against the property of the Defendant in an amount of \$421,301.00. Plaintiff has served the process of maritime attachment along with the Court's Order on various garnishees. However, to date, Plaintiff has not restrained any property of the Defendant. As a result Plaintiff engaged a company in the United Kingdom to investigate whether the Defendant, Sudama Export Pvt. Ltd. was still in business, and, if so, whether it may be using other corporate entities to conduct its business. Plaintiff obtained the investigator's report last week which indicates that Plaintiff works under the name of A.B. Minerals and is related to Devi Trading. Plaintiff also suspects that Defendant may be arranging all of its transactions to go under these names, and thereby circumventing the order of the Court. If Plaintiff is not permitted to file an Amended Verified Complaint to include A.B. Minerals and Devi Trading, it will be prevented from fully securing its claims against the Defendant. In the circumstances, we respectfully request your Honor grant Plaintiff's application to amend its complaint to include the two additional defendants.

We very much appreciate the Court's consideration of this request. We are available to discuss the matter at any time convenient to the Court.

Respectfully submitted,

LAW OFFICES OF RAHUL WANCHOO

Rahul Wanchoo
Rahul Wanchoo (RW-8725)

Plaintiff has not attached
assets to date. I will
grant the application because the
original Order was entered on
June 6, 2008, then discontinued.
No assets are served by
June 6, 2008, then discontinued.
action should be DISMISSED.

Rahul Wanchoo 2/27/08